

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JAMES CODY <i>et al.</i>,)	
)	
Plaintiffs,)	Case No. 4:17-cv-02707-AGF
)	
v.)	
)	
CITY OF ST. LOUIS,)	
)	
Defendant.)	

JOINT MOTION FOR ATTORNEYS' EYES ONLY PROTECTIVE ORDER

COME NOW Plaintiffs James Cody, Jasmine Borden, Vincent Grover, John Doe, John Roe, Michael Mosley, and Diedre Wortham ("Plaintiffs") and Defendant City of St. Louis ("City"), and for their Joint Motion for Attorneys' Eyes Only Protective Order state as follows:

1. The City of St. Louis Division of Corrections Internal Affairs Unit maintains videos recorded inside of the City of St. Louis Medium Security Institution ("MSI").
2. Pursuant to the Court's November 7, 2018 Order, the parties have negotiated and agreed upon the attached protective order limiting these videos to attorneys' eyes only and to be used in this litigation only. (Ex. A, Agreed Attorneys' Eyes Only Protective Order).
3. Plaintiffs and City agree that the attached protective order is necessary to protect the confidential and sensitive nature of these videos and to ensure that the videos are used for purposes of this litigation only and for no other purpose.

4. The parties respectfully request that the Court enter their proposed attorneys' eyes only protective order, attached hereto as "Exhibit A."

WHEREFORE, Plaintiffs and City respectfully request that this honorable Court enter a Protective Order in this case.

Respectfully submitted,

/s/ Blake A. Strobe

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CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2018, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system.

/s/ Andrew D. Wheaton